

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 7
	)	
DURA AUTOMOTIVE SYSTEMS, LLC,	)	Case No. 19-12378 (KBO)
<i>et al.</i> , <sup>1</sup>	)	
	)	(Jointly Administered)
Debtors.	)	

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICES**

**PLEASE TAKE NOTICE** that, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the undersigned counsel enters his appearance as counsel for creditor Kevin Grady (“Grady”) and request that all notices and other papers filed or served in the above-captioned cases be served upon the following attorney:

Chad J. Toms, Esq.  
WHITEFORD, TAYLOR & PRESTON LLC  
600 North King Street, Suite 300  
Wilmington, Delaware 19801  
Telephone: (302) 353-4144  
Facsimile: (302) 661-7950  
Email: ctoms@wtplaw.com

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery,

---

<sup>1</sup> The debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity’s federal tax identification number, are: Dura Automotive Systems Cable Operations, LLC (7052); Dura Automotive Systems, LLC (8111); Dura Fremont L.L.C. (1252); Dura G.P. (8092); Dura Mexico Holdings, LLC (4188); Dura Operating, LLC (2034); and NAMP, LLC (3693). Dura Automotive Systems, LLC’s service address is: 1780 Pond Run, Auburn Hills, Michigan 48326.

telephone, electronic filing, facsimile, or otherwise filed or made with regard to the referenced cases and proceedings herein.

**PLEASE TAKE FURTHER NOTICE** that filing of this *Notice of Appearance and Request for Notices* shall not be deemed or construed to constitute a waiver of any substantive or procedural right of Grady including, without limitation: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to these cases or any cases, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution, heard by the District Court; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which Grady is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until Grady expressly states otherwise, Grady does not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

*[Remainder of page intentionally left blank]*

Dated: June 24, 2022  
Wilmington, Delaware

Respectfully submitted,

/s/ Chad J. Toms

Chad J. Toms (No. 4155)  
WHITEFORD, TAYLOR & PRESTON LLC  
The Renaissance Centre, Suite 500  
405 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 353-4144  
Facsimile: (302) 661-7950  
Email: ctoms@wtplaw.com

*Counsel for Kevin Grady*